

# Hillcrest Educational Centers Civil Rights Complaint Policy

## 1. Purpose and Commitment

Hillcrest Educational Centers is committed to upholding the civil rights of all participants in our programs. In accordance with the Civil Rights Requirements outlined in FNS Instruction 113-1 and the 2016 Memorandum of Understanding between the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) Civil Rights Division and the Massachusetts Department of Elementary and Secondary Education (DESE), Office for Food and Nutrition Programs, Hillcrest will promptly and properly address all civil rights concerns.

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## 2. Scope

This policy applies to any civil rights-related concern or complaint regarding federally or state-protected classes raised by participants, parents/guardians, or potential participants in connection with the operation of Child Nutrition Programs.

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## 3. Meal Modifications

Hillcrest Educational Centers recognizes that participants with disabilities may require reasonable modifications to school meals. In accordance with USDA regulations, the following procedures will be followed:

- **Meal modifications** will be provided when supported by a medical statement signed by a licensed healthcare professional identifying the disability and the specific dietary modification required.
- Modifications will also be made when food allergies rise to the level of a disability under Section 504 of the Rehabilitation Act or the Americans with Disabilities Act.
- All requests will be handled **without delay** and in a **nondiscriminatory manner**, with a focus on inclusivity, dignity, and respect for the participant's needs.
- Food service staff are trained to ensure modified meals are served in a way that prevents cross-contact and protects students' civil rights.

- Parents/guardians and participants will be informed of the right to file a civil rights complaint if they believe their meal modification request has been unfairly denied or improperly handled.
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## 4. Civil Rights Complaint Procedure

### Step 1: Inform

- Notify the individual expressing a concern that they have the right to file an official Civil Rights complaint.
- Determine if parent/guardian notification is appropriate.
- Offer to explain the complaint process and let the individual know they may submit a complaint anonymously.
- Ask if the individual wants to file an official complaint:
  - **If No:**
    - Ask how you can help.
    - Clarify what the individual wants done with the information provided.
    - Work toward resolution without formal submission, if that is their preference.
    - If the individual confirms the issue is resolved to their satisfaction, no further action is required.
  - **If Yes:**
    - Offer to walk the individual through the USDA complaint process.
    - Determine if they want to:
      - Submit the complaint themselves; or
      - Have you accept and help submit the complaint on their behalf.
    - If they choose to file independently, ask if there's anything else you can do to help in the interim.
    - If they request assistance, proceed to **Accept, Document, and Share** the complaint.

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### Step 2: Accept

- Accept any official complaint in any format (verbal or written).
- Clarify again whether the individual wants to pursue a formal Civil Rights complaint or simply have the issue resolved informally.
- Hillcrest's procedures must:
  - Not restrict when, how, or through whom complaints may be submitted.
  - Not mandate the use of a specific form or contact person.
  - Ensure that any employee who receives a complaint is prepared to accept it.

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### Step 3: Document

- Record the complaint in the **Child Nutrition Programs Complaint Log**.
- Information to be captured includes:
  - How the complaint was received (verbally or in writing).
  - Who received the complaint (name and role).
  - Complainant's name and contact information.
  - Date and location (including county) of the alleged incident.
  - Alleged discriminatory basis (e.g., race, color, national origin, sex, age, disability).
  - Person(s) or organization(s) accused of discrimination.
  - Referral date to USDA FNS Civil Rights Division (if applicable).
  - Summary of investigation findings and any corrective action taken.
- If verbal, the recipient must transcribe a detailed account.

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### Step 4: Share

- Forward the documented complaint within **5 business days** to the FNS Civil Rights Division using one of the following methods:

**Mail:**

U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410

**Fax:** (202) 690-7442

**Email:** [program.intake@usda.gov](mailto:program.intake@usda.gov)